

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

- against -

DEVON D. ARCHER,  
BEVAN T. COONEY,  
HUGH DUNKERLEY,  
JASON W. GALANIS,  
JOHN P. GALANIS,  
GARY T. HIRST, and  
MICHELLE A. MORTON,

NOTICE OF MOTION

ECF Case

No. 16 Civ. 3505 (WHP)

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PLEASE TAKE NOTICE that upon the Complaint in the above-captioned action; the Indictment in criminal case United States v. Jason Galanis et al., 16 Cr. 371 (RA) (the “criminal action”); and the accompanying memorandum of law, the United States of America, by its attorney Preet Bharara, United States Attorney for the Southern District of New York, will move this Court for an order (1) permitting the United States to intervene in the above-captioned case, pursuant to Federal Rule of Civil Procedure 24; and (2) staying (a) depositions, interrogatories, requests for admission, and any other form of discovery that would create statements of any person whom the Government asserts may be called as a witness in the criminal prosecution; (b) production of transcripts of testimony and notes of or memoranda describing interviews with; written statements made or adopted in the course of an interview by; or correspondence concerning interviews of any person whom the Government asserts may be called as a witness in the criminal action; and (c) disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1)(A)(i), until the conclusion of the parallel criminal case, *United States v. Jason Galanis*

*et al.*, 16 Cr. 371 (RA), as well as for such other relief as the Court deems just and proper.

Dated: New York, New York  
July 11, 2016

Respectfully submitted,

PREET BHARARA  
United States Attorney

By: /s/  
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